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May 10, 2024

**VIA ECF only**

The Honorable Andre M. Espinosa, USMJ  
Martin Luther King Jr, Fed. Building  
& U.S. Courthouse  
50 Walnut Street, Courtroom MLK 2D  
Newark, New Jersey 07101

**RE: Ramirez Rodriguez v. West New York Board of Ed., et al.**  
**Civil Action No. 18-cv-17081(JMV-MF)**  
**File No. JMM-E1374.21**

Dear Judge Espinosa:

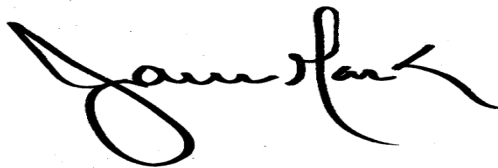
As Your Honor is aware, I represent Gisela Ramirez-Rodriguez. On April 18, 2024 we appeared before Your Honor for our second settlement conference, which resulted in an agreement on terms and conditions of settlement subject to the BOE vote. The BOE vote was to be held on May 6th, carried then to May 7, 2024, during its regular working session meeting, however, the Board did not vote on this settlement but carried the vote for another, later date. The Board's next meeting is set for June 12, 2024. I do not know if the Board is voting on this matter at the June 12, 2024 board meeting.

As such, I request that Your Honor vacate its 60-day order as it will be impossible for the BOE to come to an agreement to accept or reject this settlement, but then allow adequate time to negotiate and execute closing documents, all prior to the expiration of the 60 days or by June 18, 2024.

As such, I respectfully request that Your Honor vacate the April 18, 2024 "60-day" order, and reopen the matter.

Respectfully,

***THE MARK LAW FIRM***



**JAMISON M. MARK**

JMM/dmc  
cc : Dennis Schmieder, Esq.

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